

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION  
AT AKRON, OHIO

|                        |   |                                      |
|------------------------|---|--------------------------------------|
| IN RE:                 | ) | CASE NO. 17-50814-AMK                |
|                        | ) |                                      |
| KATALIN ZSUZSANNA DUS, | ) | CHAPTER 13                           |
|                        | ) |                                      |
| Debtor.                | ) | BANKRUPTCY JUDGE                     |
|                        | ) | ALAN M. KOSCHIK                      |
|                        | ) |                                      |
|                        | ) | <u>OBJECTION TO CONFIRMATION OF</u>  |
|                        | ) | <u>AMENDED CHAPTER 13 PLAN FILED</u> |
|                        | ) | <u>JANUARY 23, 2018</u>              |
|                        | ) |                                      |

Now comes the Creditor, Kristen M. Scalise, Summit County Fiscal Officer, and hereby objects to the Confirmation of the Amended Plan of the Debtor filed herein on January 18, 2018, for the following reasons:

1. The Chapter 13 Plan of Debtor, in violation of 11 U.S.C. Section 1325(a)(5), fails to adequately provide for the secured claim of the Summit County Fiscal Office , which holds the first and best lien for delinquent real estate taxes on the real property of the Debtor located at 1135 Canyon View Road, #306, Northfield, OH 44067-2259.
2. Creditor has a total secured claim of \$11,799.17 for delinquent real estate taxes on the subject property. Debtor's Plan fails to provide for any payment of this claim in the Plan. Instead Debtor seeks to to enter into a separate payment plan with

the Summit County Fiscal Office. Debtor is not eligible for any payment plan offered by the Summit County Fiscal Office.

3. Creditor has no adequate assurance of payment of its claim at this time;
4. This objection shall act as a standing and continuing objection to the currently proposed plan of Debtor and any subsequent plan or plans, which the Debtor may file.

Respectfully submitted,

/S/Regina M. VanVorous  
Regina M. VanVorous, #0020786  
Attorney for Creditor Kristen M. Scalise,  
Fiscal Officer,  
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#### **CERTIFICATE OF SERVICE**

I certify that on the 25th day of January, 2018, copies of this Objection to the Confirmation of the Plan of Debtor were served by regular U.S. Mail or by electronic mail to the persons listed below:

Katalin Zsuzsanna Dus  
1135 Canyon View Road, #306  
Northfield, OH 44067

M. Katherine Bushey  
Darcy Mehling Good  
Kaman & Cusimano, LLC  
50 Public Square, Ste. 2000  
Cleveland, OH 44113

Keith Rucinski  
Chapter 13 Trustee  
One Cascade Plaza, Ste. 2020  
Akron, Ohio 44308

Daniel M. Dermott, Esq.  
Office of the US Trustee

/S/ Regina M. VanVorous  
Regina M. VanVorous, #0020786  
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